

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2014 JUL 14 AM 11:02

OFFICE OF GENERAL  
COUNSEL

MUR 6522

July 1, 2014

Federal Election Commission  
Office of Complaints Examination  
Attn: Frankie Hampton, Paralegal  
999 E Street, NW  
Washington, DC 20436

Mr. Jordan

I am in receipt of your letter concerning a complaint that you received on May 15, 2014 from a Mr. Ken Dickson.

On or about January, 2014, I went to a political rally for a Mr. John Ratcliffe and was impressed with the young man so I subsequently gave him a check for \$10,000.

Several months later, I was called and asked if my wife, Naomi Jackson, was deceased and I said yes.

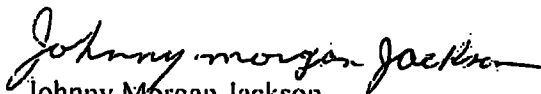
I was told that they had put some monies into my deceased wives' name due to the checking account being in both my and Naomi's name. Several years ago when Naomi had passed away, I asked my bank whether I needed to change the bank account and they said no. I have had that account for 20 years.

The Ratcliffe for Congress campaign manager sent me a check refunding all monies they had mistakenly put in Naomi's name.

Attached is a copy of the check I wrote and a copy of the check that I received from the campaign.

I hope this alleviates any concerns.

Sincerely,

  
Johnny Morgan Jackson

Greenville Tx 75402

14005410101001



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2014 JUL 14 AM 11:03

OFFICE OF GENERAL  
JUN 27 2014 COUNSEL

Johnny Jackson  
5312 Kayway Dr.  
Greenville, TX 75402

RE: MUR 6822

Dear Mr. Jackson:

The Federal Election Commission received a complaint that indicates you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 6822. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to an administrative oversight. Under the Act you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

Any correspondence sent to the Commission must be addressed as follows:

**Mail**

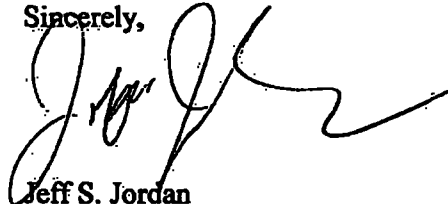
Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Frankie Hampton, Paralegal  
999 E Street, NW  
Washington, DC 20436

**Email**

fhampton@fec.gov

If you have any questions, please contact Frankie Hampton at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination &  
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel Statement

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2014 MAY 16 AM 11:43

May 15, 2014

OFFICE OF GENERAL  
COUNSEL

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 6822

Re: Violations of the Federal Election Campaign Act by Ratcliffe for Congress

I am in possession of information that suggests Ratcliffe for Congress has accepted at least \$5,000 from an individual who has been deceased for more than five years. If true, the acceptance and expenditure of these funds give rise to serious questions about possible violations of the Federal Election Campaign Act by Ratcliffe for Congress.

According to Ratcliffe for Congress's campaign finance report filed with the Federal Election Commission on February 20, 2014, a "Naomi Jackson" with the address of "5312 Kayway Drive, Greenville, TX 75402" made \$5,000 in contributions on January 13, 2014. <http://docquery.fec.gov/pdf/214/14940533214/14940533214.pdf>. However, according to the attached obituary published in *The Herald Banner* in Greenville, Texas, Naomi Jackson passed away August 2, 2008. Her surviving spouse, Johnny Morgan Jackson, is currently listed at the same address. <http://www.advancedbackgroundchecks.com/d/johnny-jackson/38617994>.

Although it is conceivable for campaigns to unknowingly accept contributions from a deceased individual, it is suspicious and troubling that Ratcliffe for Congress lists Naomi Jackson's occupation and employer as "Retired". It is my understanding that the law requires campaigns to collect and report this information for their contributors, and it appears that Ratcliffe for Congress has violated the law by falsifying such information.

The runoff election for Texas' 4th congressional district will be held May 27, 2014. Therefore, I urge the Commission to immediately investigate this matter and take all actions necessary to remedy these violations. In the meantime, Ratcliffe for Congress should be required to disgorge all illegal contributions that it has received.

Thank you for your attention to this matter.

Sincerely,

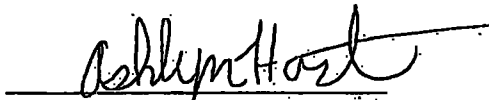


Ken Dickson

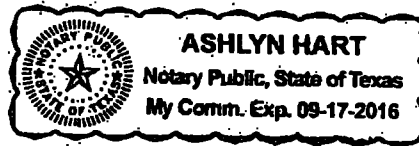
I hereby swear and affirm that the facts presented in this complaint are true to the best of my knowledge, information and belief. Sworn pursuant to 18 U.S.C. §1001.

  
Ken Dickson

Subscribed and sworn to before me this 15<sup>th</sup> day of May, 2014.

  
Notary Public

My Commission expires: 9/17/2016



RECEIVED  
FEDERAL ELECTION  
COMMISSION

**SCHEDULE A (FEC Form 3)**  
**ITEMIZED RECEIPTS**

2014 MAY 15 PM 5:50  
OFFICE OF SENATOR  
COUNSEL

FOR LINE NUMBER:		PAGE 9 OF 50	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
12	13a	13b	14
			15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full) <b>Ratcliffe for Congress</b>		Date of Receipt MM / DD / YYYY 02 / 10 / 2014	
Full Name (Last, First, Middle Initial) <b>Deanne Noel</b>		Transaction ID : A-CF348	
Mailing Address 11215 Hermosa Court		Amount of Each Receipt this Period 2600	
City Houston	State TX	Zip Code 77024-7409	
FEC ID number of contributing federal political committee. C			
Name of Employer Self	Occupation Self		
Receipt For: 2014 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 2600	
Full Name (Last, First, Middle Initial) <b>Bob Clements</b>		Date of Receipt MM / DD / YYYY 01 / 12 / 2014	
Mailing Address 517 Moraine Way		Transaction ID : A-CF161	
City Heath	State TX	Zip Code 75032-8903	
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 1000	
Name of Employer Leon's Texas Cuisine	Occupation CEO		
Receipt For: 2014 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 1000	
Full Name (Last, First, Middle Initial) <b>Naomi Jackson</b>		Date of Receipt MM / DD / YYYY 01 / 13 / 2014	
Mailing Address 5312 Kayway Drive		Transaction ID : A-CF172	
City Greenville	State TX	Zip Code 75402-6408	
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 2500	
Name of Employer Retired	Occupation Retired		
Receipt For: 2014 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 5000	
SUBTOTAL of Receipts This Page (optional)		6100.00	
TOTAL This Period (last page this line number only)			

**SCHEDULE A (FEC Form 3)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 9 OF 50

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 15
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (In Full)  
**Ratcliffe for Congress**

Full Name (Last, First, Middle Initial)

**Deanne Noel**

A.

Mailing Address 11215 Hermosa Court

City

Houston

State

TX

Zip Code

77024-7409

FEC ID number of contributing federal political committee.

**C**

Name of Employer

Self

Occupation

Self

Receipt For: 2014

☒

Primary

☐

General

☐

Other (specify)

Election Cycle-to-Date

2600

Date of Receipt

 M M / D D / Y Y Y Y  
 02 10 2014

Transaction ID : A-CF348

Amount of Each Receipt this Period

2600

Full Name (Last, First, Middle Initial)

**Bob Clements**

B.

Mailing Address 517 Moraine Way

City

Heath

State

TX

Zip Code

75032-8903

FEC ID number of contributing federal political committee.

**C**

Name of Employer

Loon's Texas Cuisine

Occupation

CEO

Receipt For: 2014

☒

Primary

☐

General

☐

Other (specify)

Election Cycle-to-Date

1000

Date of Receipt

 M M / D D / Y Y Y Y  
 01 12 2014

Transaction ID : A-CF161

Amount of Each Receipt this Period

1000

Full Name (Last, First, Middle Initial)

**Naomi Jackson**

C.

Mailing Address 5312 Kayway Drive

City

Greenville

State

TX

Zip Code

75402-6408

FEC ID number of contributing federal political committee.

**C**

Name of Employer

Retired

Occupation

Retired

Receipt For: 2014

☒

Primary

☐

General

☐

Other (specify)

Election Cycle-to-Date

5000

Date of Receipt

 M M / D D / Y Y Y Y  
 01 13 2014

Transaction ID : A-CF172

Amount of Each Receipt this Period

2500

SUBTOTAL of Receipts This Page (optional)

6100.00

TOTAL This Period (last page this line number only)

# The Herald Banner, Greenville, TX

August 4, 2008

## Naomi Jackson

*Evelyn Naomi Jackson, 66, of Greenville passed away Saturday, Aug. 2, 2008 at her residence. Services are at 10 a.m. Tuesday at Coker-Mathews Funeral Home chapel with Dr. John Tate officiating. Burial will follow at Memoryland Memorial Park.*

*Visitation is from 6 to 8 p.m. today at the funeral home.*

*Mrs. Jackson was born Sept. 25, 1941 in Greenville to George Wright Sockwell and Opal May Bell Sockwell. On Sept. 15, 1961, she was married to Johnny Morgan Jackson in Greenville.*

*She was a housewife, mother, and owned the Love Bug Boutique from 1980 to 1989. She was a member of Central Christian Church and belonged to the Christian Women's Fellowship.*

*Surviving are her husband, Johnny of Greenville; son, Johnny Jackson, Jr. and wife, Teresa Allen; daughter, Jennifer Lynn Jackson Bobst and husband, Dan of Heath; grandchildren, Alexis, Brody, and Brianna Bobst of Heath and Ruby Jackson of Allen.*

*She was preceded in death by her parents and brothers, James Glen Sockwell and George Harle Sockwell, and aunt and uncle, Earl and Ruby Bingham.*

*Gerald Hall, John Harvey, Doug Jackson, Butch Mitchell, Tim Newland, and Kenneth Petei are pallbearers. Honorary pallbearers are Lynn Jackson, Wayne Jackson, Jeffery Jackson, and Richard Willis.*

*Family requests memorials be made to the Central Christian Church Window Fund, 2611 Wesley, Greenville, 75401.*